

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

ANTHONY LAWRENCE DASH,

Plaintiff,

vs.

FLOYD MAYWEATHER, JR.;  
MAYWEATHER PROMOTIONS;  
MAYWEATHER PROMOTIONS, LLC;  
PHILTHY RICH RECORDS, INC.; and  
WORLD WRESTLING  
ENTERTAINMENT, INC.,

Defendants.

CIVIL ACTION NO.  
3:10-CV-01036-JFA

AFFIDAVT OF NEIL LAWI

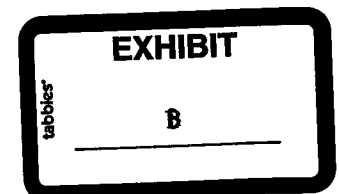
I, Neil Lawi, being first duly sworn, hereby depose and say:

1. I am over eighteen (18) years of age, have personal knowledge of the matters set forth herein and am competent to testify thereto.

2. I am the Vice President, Music, of World Wrestling Entertainment, Inc. ("WWE"). In that capacity, I oversee the licensing and use of music in connection with WWE events and programming.

3. As part of my duties and responsibilities as WWE's Vice President, Music, I am familiar with WWE's use of the song "Yep" by Floyd Mayweather in conjunction with Mayweather's entrance/appearance in WWE's WRESTLEMANIA XXIV show.

4. WWE originally planned to use a song by "50 Cent" in conjunction with Mayweather's entrance/appearance in WRESTLEMANIA XXIV.



5. The night before WRESTLEMANIA XXIV, however, Mayweather's manager, Leonard Ellerbe, handed me a CD and requested that WWE play the song on that CD in connection with Mayweather's entrance. The song on the CD was a recording of "Yep."


6. At the time, I asked Ellerbe whether Mayweather owned all rights to the song. Ellerbe responded that Mayweather did own all rights to the song and that Mayweather granted WWE the right to use the song in any media in connection with Mayweather's appearance in WRESTLEMANIA XXIV.

7. Based on this information, WWE had no knowledge of, and no reason to expect, any issue with Mayweather's alleged infringement of Plaintiff's purported work.

8. Prior to being served with the complaint in the above-referenced action, WWE did not know of the existence of Plaintiff's purported work.

9. I have freely given this statement. It is true and accurate to my best knowledge and memory.

FURTHER DEPONENT SAYETH NOT.

  
NEIL LAWI

Sworn to and subscribed before me this  
14<sup>th</sup> day of June, 2010.



Notary Public

My Commission Expires:

**JANET P. COLE**

**NOTARY PUBLIC**

**COMMISSION EXPIRES MAR. 31, 2014**